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11 **JARED EDWARDS**

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13 **UNITED STATES DISTRICT COURT**
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CENTRAL DISTRICT OF CALIFORNIA

15 JARED EDWARDS,
16 Plaintiff,
17
18 v.
19 KEENEN IVORY WAYANS, et al.,
20 Defendants.

21 CASE NO. CV10- 2231 R (RCx)
22 The Honorable Manuel L. Real
23 Courtroom 8
24
[PROPOSED] VERDICT FORM
25
26 Trial Date: July 12, 2011
27 Location: Courtroom 8
28

1 Plaintiff Jared Edwards respectfully submits the following proposed verdict
2 form pursuant to Fed. R. Civ. P. 49, L.R. 49, and the Procedures of the Honorable
3 Manuel L. Real, and respectfully requests permission to supplement or modify this
4 proposed verdict form as may be necessary or appropriate after submission of all of
5 the evidence at trial or during an appropriate conference with the Court. Plaintiff
6 Jared Edwards asserts the following claims against Defendants Keenen Ivory
7 Wayans, Shawn Wayans, Marlon Wayans and Wayans Bros. Productions (“Wayans
8 Defendants”) and St. Martin’s Press, LLC (“Defendant SMP”) (collectively, the
9 Defendants): (1) Copyright infringement in violation of the Copyright Act, 17 U.S.C.
10 §§ 101 et seq., and (2) Breach of implied contract under California law.

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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JARED EDWARDS,

Plaintiff,

V.

KEENEN IVORY WAYANS, et al.,

Defendants.

CASE NO. CV10- 2231 R (RCx)

The Honorable Manuel L. Real

Trial Date: July 12, 2011

Location: Courtroom 8

JURY VERDICT SHEET

WE, THE JURY, FIND AS FOLLOWS:

COPYRIGHT CLAIM

1. Do you find that Jared Edwards demonstrated, by a preponderance of the evidence, that he is the owner of a valid copyright of the work “*You Know You’re a Golddigger When...*”?

Yes No

If you answered “Yes” to Question 1, please proceed to Question 2.

If you answered “No” to Question 1, please go to Question 4.

2. Do you find that Jared Edwards demonstrated, by a preponderance of the evidence, that Defendants copied original elements from the copyrighted work *“You Know You’re a Golddigger When...”* in the *101 Ways to Know You’re a Golddigger* book?

Yes No

If you answered “Yes” to Question 2, please proceed to Question 3.

If you answered “No” to Question 2, please go to Question 4.

3. What amount of damages do you find that Jared Edwards has proven, by a preponderance of evidence, that Defendants caused him as a result of their copyright infringement?

\$ _____

Please continue to Question 4.

BREACH OF IMPLIED CONTRACT

4. Do you find that Jared Edwards demonstrated, by a preponderance of the evidence, that he prepared the work "*You Know You're a Golddigger When...*"?

Yes No

If you answered “Yes” to Question 4, please proceed to Question 5.

If you answered “No” to Question 4, you have concluded your deliberations.

5. Do you find that Jared Edwards demonstrated, by a preponderance of the evidence, that he disclosed "*You Know You're a Golddigger When...*" for sale under circumstances from which it could be concluded that Defendants voluntarily accepted the disclosure knowing the conditions on which it was tendered?

Yes No

If you answered “Yes” to Question 5, please proceed to Question 6.

If you answered “No” to Question 5, you have concluded your deliberations.

1 6. What is the reasonable value for the disclosure and/or work of “*You Know*
2 *You’re a Golddigger When...*” that Jared Edwards has proven, by a
3 preponderance of the evidence, that Defendants failed to pay as a result of
4 their breach of implied contract?

5 \$_____

6 You have concluded your deliberations. Please sign and date the verdict
7 sheet.

8
9 SO SAY WE ALL.

10 DATED this _____ DAY OF JULY, 2011.

11
12 _____
13 Foreperson

1 SUBMITTED BY:

2 Dated: July 5, 2011

THOMPSON WIGDOR LLP

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4 By: _____/s/_____

5 Kenneth P. Thompson, Esq.

6 Basil C. Sitaras, Esq.

7 Attorneys for Plaintiff Jared Edwards

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